

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA

Plaintiff,

v.

**COMMONWEALTH OF PUERTO RICO,
et. al.**

Defendants.

CIVIL NO. 12-2039 (GAG)(PG)

**EXTENSION OF TIME TO PROVIDE COMMENTS TO THE TCA'S PRELIMINARY
SPECIAL REPORT ON CROWD CONTROL**

TO THE HONORABLE COURT:

COME NOW the Commonwealth of Puerto Rico and The Puerto Rico Police Bureau, through the undersigned counsel, and respectfully allege and pray as follows:

1. On November 16, 2017, an in-camera status conference was held in this case to update and inform this Honorable Court on all pending matters, as well as to set a realistic date for the next public status hearing in 2018. (See Docket No. 632). On that same date, the Court ordered that a joint proposed timetable of all the deadlines agreed upon and/or set by the Court at the status conference be filed by the next day before noon. (See Docket Nos. 639 and 640).

2. On November 17, 2017, this Honorable Court issued an order setting a timetable based on the discussion held in the in-camera status conference on all pending matters. Specifically, the Court ordered that Defendants to provide comments on the TCA's Preliminary Six-Month Report, pursuant paragraph 252 of the Agreement

by January 11, 2018 and to provide comments on the TCA's Preliminary Special Report on crowd control on January 12, 2018. (See Docket No. 644).

3. On January 11, 2018, PRPB requested an extension of time for the newly appointed Police Commissioner to have enough time to revise both reports and provide its comments on both reports on January 17, 2018.

4. On this date, PRPB has submitted its comments on the TCA's Preliminary Six-Month Report, pursuant paragraph 252 of the Agreement. However, the PRPB will need an additional extension of time to submit its comments on the TCA's Preliminary Special Report on crowd control.

5. The assessment of the PRPB on the TCA's Preliminary Special Report on crowd control has taken more time than anticipated. The TCA's consultant, Mr Pujol, has prepared a well-written report, but at the same time it is long and technical.

6. Consequently, PRPB requests a final extension of time to submit its comments to the TCA's Preliminary Special Report on crowd control before January 24, 2018. This final request for an extension of time will provide the PRPB with enough time to adequately comment on the TCA's Preliminary Special Report on crowd control and have fruitful discussions on the report with the TCA and USDOJ.

7. Prior to drafting this motion, the undersigned contacted both the TCA and USDOJ, on the Commonwealth's intention to seek an extension of time.

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of the above stated and grant this instant motion for an extension of time, until January 24, 2018, to provide comments to the TCA's Preliminary Special Report on crowd control.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on January 17, 2018.

WANDA VÁZQUEZ GARCED

Secretary of Justice

WANDYMAR BURGOS VARGAS

Deputy Secretary in Charge of
Litigation
Department of Justice

SUSANA PEÑAGARÍCANO BROWN

Director of Federal Litigation
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